

Zachary C. Oren, Esq.
Attorney at Law
401 Rutger Street
Utica, NY 13501

July 1, 2022

Honorable Andrew T. Baxter
U.S. Magistrate Judge
P.O. Box 7396
Syracuse, NY 13261-7396

Re: Puleo v. Masonic Medical Research Institute, et al.
Civil Act. No.: 6:20-cv-1593 (TJM/ATB)

Dear Judge Baxter:

Please receive this letter request for an approximate thirty (30) day extension for the close of the discovery and dispositive motion deadlines for the above captioned matter. Accordingly, the deadlines would be reset to August 1, 2022 for the close of discovery, and October 3, 2022 for the dispositive motion deadline.

Kindly recall that Plaintiff is trying to depose Lewis Guinther and Sarah Guinther, who are no longer under MMRI's employ and have not been deposed. Kindly further recall that Plaintiff is continuing to try and locate them for a deposition. Presently, Plaintiff has made progress in this regard. Specifically, Plaintiff believes that the couple lives in Tewksbury, Massachusetts. Furthermore, Plaintiff believes that Mrs. Gunther may work for the Charles River facility in Massachusetts. Accordingly, Plaintiff is asking for an extension of time to hopefully complete these depositions.

I thank the Court for its understanding and patience with this matter.

Respectively,

/s/ Zachary C. Oren

Zachary C. Oren, Esq.

CC: Adam P. Mastroleo, Esq. (*via cm/ecf filing*)
Hannah K. Redmond, Esq. (*via cm/ecf filing*)